

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF OKLAHOMA

VIDEO GAMING TECHNOLOGIES, INC.,

Plaintiff,

v.

CASTLE HILL STUDIOS LLC, *et al.*

Defendants.

CASE NO. 17-CV-00454-GKF-JFJ

**DEPOSITION TRANSCRIPTS
SUBMITTED PURSUANT TO
PROTECTIVE ORDER (DKT. 55)**

DEFENDANTS' NOTICE OF SUBMISSION OF DEPOSITION HARD COPIES

Defendants, Castle Hill Studios LLC, Castle Hill Holdings LLC, and Ironworks Development LLC (collectively, "Castle Hill"), hereby provide notice of their submission of hard copies of deposition transcripts to the Court Clerk.¹ Pursuant to LCvR 30.1(c), the parties met in person on August 12, 2019 to discuss and attempt to narrow their respective objections, and have continued to communicate regarding both the substance and logistics of this designation filing.

Pursuant to the parties' agreement,² Castle Hill is filing the following deposition transcripts in hard copy with the Court Clerk: Sarah Carlson; Josh Davis; Craig Eubanks; Larry Graham; Will Harvie; Don Kovach; David Marsh; Butch McGill; Ryan North; Karl Roelofs; Jay Sevigny; Barry Smitherman; James Starr; Zach Trover; and, Jon Yarbrough. Note that certain portions of the depositions have been designated as either **CONFIDENTIAL** or **HIGHLY CONFIDENTIAL** by one or both of the parties pursuant to the Court's protective order (Dkt. 55).

¹ Pursuant to the Court's Fifth Amended Scheduling Order, Castle Hill is separately filing a brief setting forth its objections to VGT's designations as well as briefing on "unusual objections."

² This list includes certain transcripts in which both parties designated testimony (as opposed to counter-designating only). Likewise, VGT is filing hard copies of the depositions of certain witnesses, including certain transcripts in which both parties designated testimony. As part of the parties' meet and confer, the parties agreed on which party would have primary responsibility for the hard copy filing of each transcript.

The deposition transcripts have been highlighted with the parties' respective designations and objections, and the parties' respective objections have been annotated on the appropriate page of the transcript. The highlighting was completed as follows:

Designation	Highlighting Color
Castle Hill ("CHG") Designation	Yellow
VGT Counter-Designation	Purple
VGT Designation	Red
CHG Counter-Designation	Green
CHG Objection	Turquoise
VGT Objection	Gray
CHG Objection to Counter-Designation	Pink

Dated: August 15, 2019

Respectfully submitted,

/s/ Robert C. Gill

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CERTIFICATE OF SERVICE

I hereby certify that on this 15th day of August, 2019, I caused a copy of the foregoing **DEFENDANTS' NOTICE OF FILING OF DEPOSITION DESIGNATIONS** to be filed via the Court's ECF system, which will provide electronic notification of filing to the following counsel for Plaintiff:

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